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AT&T

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February 18, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte meeting
Second Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Wednesday, February 17, 1999, Jay Bradbury, David Eppsteiner, and I, of AT&T, Michael Hou of Community Network, and Karen Reidy and Bryan Greene of MCI, met with Claudia Fox, Jake Jennings, Andrea Kearney, and Claudia Pabo of the Common Carrier Bureau. At the request of Commission staff, the parties reviewed their position of record in this proceeding with an emphasis on the need for a nondiscriminatory machine-to-machine interface for maintenance and repair using the enclosed materials. In sum, we emphasized the dual entry issues (increased errors and cost) imposed with the lack of a machine-to-machine interface that were previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Robert W. Quinn, Jr.

Attachment

cc: Claudia Fox
Jake Jennings
Andrea Kearney
Claudia Pabo

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List ABCDE

The Need For A Machine-to-Machine Maintenance and Repair Interface

The Competitive Impact

- If CLECs Hope to Compete With Incumbents, They Must Provide Better Customer Service and Lower Prices
  - All Customer Needs Must Addressed On Each Customer Contact
  - A CLEC Must Be Able To Efficiently Access All of An Individual Customer's Data On Every Call
  - Therefore, CLECs Must Be Able to Access Their Data As Well As ILEC Data

Why A Machine-to-Machine Repair Interface Is Necessary

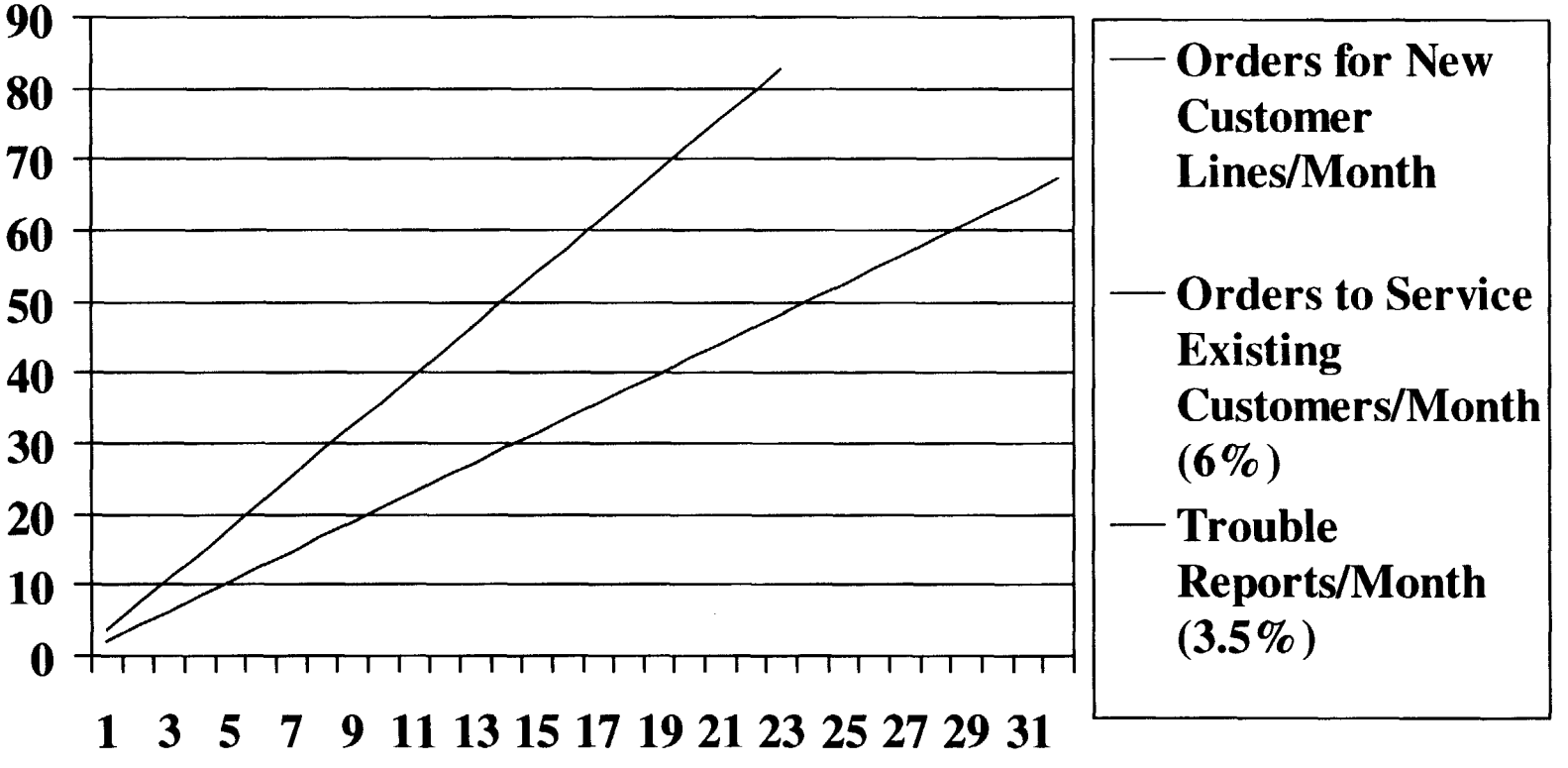
- Billing Data
  - Recurring Repairs Require Customer Credits
- Existing Services
  - Must Be Able to Add/Change Services
  - Must Be Able to Adjust Existing Calling Plans
- CSR Data
  - Necessary to Keep Contact Information Up-to-Date

Why A Machine-to-Machine Repair Interface Is Necessary

- Maintenance and Repair Volumes Will Quickly Equal New Order Volumes
  - Approximately 4% Of Lines Are Treated Monthly
  - 20%-30% of "Non-Migration" Accounts Are Treated Initially
  - Within 2 1/2 Years, Most CLECs Will Be At 1/3 Maintenance and Repair Calls; 1/3 Change Order Calls; and 1/3 New Service Calls

Hypothetical CLEC Business Plan

(7% Penetration of a 25M Line ILEC in 30 Months)



Why A Machine-to-Machine Repair Interface Is Necessary

- M & R Performance Information Is Essential
  - Real Time Access to Call Volume and Connect Time Data is Required for Efficient Staffing
  - CLEC Created Interval and Response Data Necessary to Ensure Parity
  - Without a CLEC's Own Database, CLECs are Left With Monthly RBOC Reports

Additional Cost Incurred Due to Dual Entry

- Lack of Machine-to-Machine Requires CLEC to Engage in Dual Entry
  - Dual Entry Must Occur While Customer Is On-Line for CLEC to Provide Efficient Customer Service Which Incumbent Representative Does Not
  - Dual Entry Is More Time Consuming And Results In More Mistakes, Requiring More Service Representatives